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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 17-20830

v.

HON. ROBERT H. CLELAND

D-1 DEONNE DOTSON,

Defendant.

REC'D USDC - DT  
2019 APR 3 10:01 AM

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**FIRST SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

**COUNTS ONE - SIX**  
(18 U.S.C. § 1951 - EXTORTION)

On or about the dates listed below, in the Eastern District of Michigan, Defendant DEONNE DOTSON, a sworn police officer for the City of Detroit, assigned to the 11<sup>th</sup> Precinct, did knowingly and willfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in interstate commerce by extortion, by unlawfully obtaining, under color of official right, money and property from the owner/operator of an automotive collision shop ("*Collision Shop Owner A*"), located in the City of Detroit, with his consent, which money and property was not due DOTSON as a Detroit police officer or DOTSON's official position. Each of

the following payments constitute a separate count of extortion:

Count	Date On or About	Amount Paid to Dotson	Location of Payment
1	May 19, 2014	\$500	City of Detroit
2	June 4, 2014	\$1,300	City of Detroit
3	July 8, 2014	\$1,250	City of Detroit
4	July 24, 2014	\$1,000	City of Detroit
5	August 25, 2014	\$1,600	City of Detroit
6	September 3, 2014	\$1,000	City of Detroit

All in violation of Title 18, United States Code, Section 1951.

#### **COUNT SEVEN**

(18 U.S.C. § 1951(a) - CONSPIRACY TO AFFECT COMMERCE BY EXTORTION)

1. From in or about February 2013 and continuing through at least in or about 2015 in the Eastern District of Michigan, Southern Division, Defendant DEONNE DOTSON did unlawfully, knowingly, and willfully combine, conspire, confederate, and agree with the owner/operator of an automotive collision shop ("*Collision Shop Owner B*"), located in the City of Detroit, to obstruct, delay, and affect commerce by way of extortion, that is, to obtain property from another, with consent, under color of official right; in violation of Title 18, United States Code, Section 1951(a).

**MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which DEONNE DOTSON sought to accomplish the conspiracy, included, among other things:

2. At all relevant times, DEONNE DOTSON was employed by the Detroit Police Department and was assigned as a sworn police officer to the 11<sup>th</sup> Precinct.
3. *Collision Shop Owner B* operated an automotive repair facility, specializing in collision repairs, in the City of Detroit in the Eastern District of Michigan.
4. Officer DEONNE DOTSON accepted cash payments in exchange for referring stolen and abandoned vehicles to *Collision Shop Owner B's* shop for repairs. Officer DOTSON had the power and duty as a police officer to locate stolen and abandoned vehicles, arrange for towing of those vehicles, and notify and advise the vehicle owners according to prescribed DPD procedures.
5. Between in or about February 2013 and continuing through at least in or about 2015, DEONNE DOTSON and *Collision Shop Owner B* agreed with one another for DEONNE DOTSON to accept money in exchange for using his power as a police officer to cause automobile owners to use *Collision Shop Owner B* to repair their vehicles. DEONNE DOTSON accepted from *Collision Shop Owner*

*B* at least \$500 for each vehicle he arranged to be repaired by *Collision Shop Owner*

*B.*

All in violation of Title 18, United States Code, Section 1951(a).

THIS IS A TRUE BILL.

*s/Grand Jury Foreperson*

GRAND JURY FOREPERSON

Dated: April 3, 2019

MATTHEW SCHNEIDER

United States Attorney

*s/David A. Gardey*

DAVID A. GARDEY

Assistant United States Attorney

Unit Chief, Public Corruption Unit

*s/Sarah Resnick Cohen*

SARAH RESNICK COHEN

Assistant United States Attorney


*s/Craig A. Weier*

CRAIG A. WEIER

Assistant United States Attorney

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b> 17-20830
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b> 16-20835; 17-20205; 17-20206; 17-20372; 17-20389
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b> Robert H. Cleland
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>AUSA's Initials:</b> 

**Case Title:** USA v. D-1 DEONNE DOTSON

REC'D USDC - DT  
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**County where offense occurred :** Wayne

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

\_\_\_ Indictment/\_\_\_ Information --- no prior complaint.  
\_\_\_ Indictment/\_\_\_ Information --- based upon prior complaint [Case number: \_\_\_\_\_ ]  
☒ Indictment/\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### Superseding Case Information


**Superseding to Case No:** 17-20830 **Judge:** Robert H. Cleland

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☒ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
Deonne Dotson	Ct. 7: 18 USC 1951(a)	N/A

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 3, 2019  
Date

  
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 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.